

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION

UNITED STATES OF AMERICA and )  
STATE OF INDIANA ex rel. JUDITH )  
ROBINSON, )

Relator, )

v. )

INDIANA UNIVERSITY HEALTH, INC., )  
and HEALTHNET, INC., )

Defendants. )  
\_\_\_\_\_ )

Case No. 1:13-cv-2009-TWP-MJD

**HEALTHNET, INC.'S SUPPLEMENTAL  
PRELIMINARY WITNESS AND EXHIBIT LISTS**

Defendant HealthNet, Inc. ("HealthNet"), by counsel and pursuant to the Court's Minute Entry (Doc. 168), submits its Supplemental Preliminary Witness and Exhibit Lists. Discovery is ongoing and will likely reveal additional witnesses and exhibits which will be necessary for trial, or that the witnesses and exhibits identified below will not be useful at trial. As such, HealthNet reserves the right to revise its witness and exhibit lists as additional information becomes available through discovery and trial preparation.

**I. PRELIMINARY WITNESS LIST**

1. J. Cornelius Brown (President and CEO, HealthNet);
2. Dr. Donald Trainor (Chief Medical Officer, HealthNet);
3. Lawrence Flick (Chief Financial Officer, HealthNet);
4. Carmen Davenport (Billing Supervisor, HealthNet);
5. Tisha Edwards (Accounting Manager, HealthNet);

6. Mary Blackburn (Manager of Women's Services and Midwifery, HealthNet);
7. Carrie Bonsack (OB Service Line Director, HealthNet);
8. Christina Graham (former Certified Nurse Midwife, HealthNet);
9. Booker Thomas (former Chief Executive Officer, HealthNet);
10. Elvin Plank (former Chief Operating Officer, HealthNet);
11. Dr. Marshall Keltner (OB/GYN, HealthNet);
12. Kay Johnson (Chief Development and Communications Officer, HealthNet);
13. Sydney Arak (Attorney, Arak Law);
14. Jennifer White (Acute Care Reimbursement Manager, Indiana Medicaid, Indiana Family & Social Services Administration);
15. Amanda Alvey (Director of Policy and Program Development, Indiana Medicaid, Indiana Family & Social Services Administration);
16. John D. McCullough (Director of Policy and Program Development, Indiana Medicaid, Indiana Family & Social Services Administration);
17. Current and former HealthNet representatives identified in the Second Amended Complaint, including but not limited to Patricia Furner, Rene Kugel, Dr. Kendra Karner, and Blythe Kinsey;
18. Physicians, certified nurse midwives, or other nurses who worked with Dr. Robinson or were involved in the care of those patients described in the Second Amended Complaint;
19. Representatives from IU Health;
20. Representatives from Anthem, Inc.;

21. Representatives from MDwise, Inc.;
22. Representatives from Managed Health Services, Inc.;
23. Representatives from Myers and Stauffer LC;
24. Representatives from other Indiana healthcare providers and hospital systems;
25. Plaintiff/Relator Dr. Judith Robinson;
26. All persons identified by the other parties in this lawsuit;
27. All persons identified or described in any discovery taken in this lawsuit;
28. All witnesses ultimately deposed in this lawsuit;
29. All testifying expert witnesses identified by any party;
30. All persons necessary to identify and authenticate any exhibits in this lawsuit;
31. All persons necessary for rebuttal or impeachment purposes; and
32. All witnesses discovered between the time these individuals are provided and the time of trial.

HealthNet reserves the right to amend or supplement the foregoing list and reserves any objections it may have to the testimony of any of the above named witnesses.

## **II. PRELIMINARY EXHIBIT LIST**

1. Policies and procedures that apply to or affect HealthNet;
2. Clinical records, including but not limited to HealthNet patient medical records;
3. HealthNet billing and financial records;
4. Claims submitted by HealthNet or any other Defendant to the government or government agents during the time period alleged in the Second Amended Complaint;

5. Contracts to which HealthNet is a party and/or beneficiary, including but not limited to the affiliation agreements with IU Health; hospitalist agreements; various support agreements, including but not limited to the Maternal-Fetal Medicine Support Agreement, the Maternal-Fetal Medicine Services Agreement, the Agreement to Transfer PACC from Clarian to HealthNet, the Avondale Meadows Health & Wellness Center Joint Operating Agreement, the Avondale Meadows Support Agreement, the HealthNet-Clarian-UPA Physician Staffing Agreement; and leases with IU Health;
6. HealthNet physician contracts and compensation methodologies;
7. Communications, including but not limited to internal emails, emails and correspondence between the Parties, and emails and correspondence with payers, oversight agencies, and other third parties;
8. Manuals and guidance from payers, oversight agencies, and/or other third parties, including but not limited to provider manuals, the Indiana Health Coverage Programs Provider Manual; ISMA Coalition Meeting records; and other information, resources, opinions, or answers;
9. Information from the State of Indiana and American College of Nurse Midwives regarding certified nurse midwives' scope of practice;
10. HealthNet human resources documents, including but not limited to personnel records, employment contracts, employee lease agreements, licensing or credentialing information and requirements, and job descriptions;
11. Dr. Robinson's personnel file;

12. HealthNet staffing or scheduling records or reports;
13. HealthNet meeting records, including but not limited to board, leadership, and committee meeting minutes, agendas, and packets;
14. Evaluations and reports relating to HealthNet quality reviews, including but not limited to those performed by the Health Resources and Services Administration or The Joint Commission;
15. Documents produced to the government in response to previous subpoenas;
16. All pleadings filed in this lawsuit;
17. All documents identified in the Second Amended Complaint;
18. All documents identified by the other parties in this case;
19. All discovery responses and documents produced by any party or non-party;
20. All reports and disclosures of any testifying experts;
21. Transcripts of any depositions taken in this lawsuit and all exhibits thereto;
22. All documents necessary for rebuttal or impeachment purposes;
23. All necessary demonstrative exhibits; and
24. All documents discovered between the time these exhibits are identified and the time of trial.

HealthNet reserves the right to amend or supplement the foregoing list. HealthNet reserves the right to present any designated exhibit or any portion thereof in alternate media, including by electronic means or presentation media. HealthNet reserves any objections it may have to any attempt to introduce any of the foregoing documents and things as evidence at trial.

Respectfully submitted,

/s/ Lauren C. Sorrell

Thomas J. Costakis, Attorney No. 4314-49  
Deborah J. Daniels, Attorney No. 4378-49  
Lauren C. Sorrell, Attorney No. 30895-49  
KRIEG DeVAULT LLP  
One Indiana Square, Suite 2800  
Indianapolis, Indiana 46204-2079  
T: (317) 636-4341  
F: (317) 636-1507  
tcostakis@kdlegal.com  
ddaniels@kdlegal.com  
lsorrell@kdlegal.com

Marc T. Quigley, Attorney No. 21054-53  
KRIEG DeVAULT LLP  
12800 North Meridian Street, Suite 300  
Carmel, Indiana 46032  
T: (317) 566-1110  
F: (317) 636-1507  
mquigley@kdlegal.com

*Attorneys for Defendant HealthNet, Inc.*

**CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing was filed electronically on this 24<sup>th</sup> day of June, 2016. Notice of this filing will be sent to the parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ Lauren C. Sorrell  
Lauren C. Sorrell

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